

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

14 Cr. 810 (CM)

- against -

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**DECLARATION OF
JOSHUA L. DRATEL, ESQ.
IN SUPPORT OF DEFENDANT
MOSHE MIRILASHVILI'S
PRE-TRIAL MOTIONS**

MOSHE MIRILASHVILI, :

Defendant. :

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Joshua L. Dratel, Esq., pursuant to 28 U.S.C. §1746, hereby affirms under penalty of perjury:

1. I am an attorney, and I represent defendant Moshe Mirilashvili in the above-captioned case. I make this Declaration in support of Dr. Mirilashvili's pretrial motions requesting suppression of certain evidence, a Bill of Particulars, to join in his co-defendants' motions for severance, and for leave to join in any future motions counsel is not apprised of at the time of the filing, to the extent they inure to his benefit.

2. The bases for these motions are set forth in detail in the accompanying Memorandum of Law. Also, it is respectfully requested that the facts set forth within the Memorandum of Law be incorporated by reference in this Declaration.

3. Attached as Exhibits to this Declaration, and relevant to Dr. Mirilashvili's motions, are the following:

- (a) the Indictment in *United States v. Moshe Mirilashvili*, 14 Cr. 810 (CM), attached hereto as Exhibit 1;
- (b) the search warrant application for the search of Dr. Mirilashvili's office,

attached hereto as Exhibit 2; and

- (c) the search warrant application for the search of Dr. Mirilashvili's home,
attached hereto as Exhibit 3.

WHEREFORE, it is respectfully requested that the Court grant Dr. Mirilashvili's Motions in their entirety.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. 28 U.S.C. §1746. Executed August 7, 2015.

/S/ Joshua L. Dratel
JOSHUA L. DRATEL